

[REDACTED]

From: [REDACTED]
Sent: 29 September 2026 12:45
To: Planning
Subject: Formal Objection – Proposed Surface Water Drainage Strategy, HDC DC/25/2114 + Attachment
Attachments: FLOOD PHOTOS.pdf
Categories: Comments Received

Formal Objection – Proposed Surface Water Drainage Strategy, HDC DC/25/2114

Dear Mr Holmes

I am writing to formally object to the above planning application, specifically the proposed surface water drainage strategy and the outfall pipe shown as the red discharge line. This pipe is intended to convey water from the proposed on-site swale directly into a shallow ditch within the adjoining low-lying watercourse network.

The proposal raises serious concerns regarding flood risk, downstream capacity, pollution, ecology and the practical maintenance of the drainage system. I therefore request that the proposed drainage arrangements are not approved in their current form.

1. Conflict

The proposed discharge strategy is difficult to reconcile with West Sussex County Council's current Natural Flood Management (NFM) approach for Upper Beeding.

The Council has specifically identified Upper Beeding as the location of a natural flood management scheme involving wetland habitat, floodplain woodland and "leaky dams" designed to slow the movement of water and increase natural storage. The Council is investing in these measures as part of its wider nature-recovery and flood-management work.

[West Sussex County Council — Council launches drive to boost nature recovery in West Sussex](#)

Against this background, the proposal to convey water through a concentrated piped outfall directly into the adjoining watercourse requires particular justification. It introduces a point-source discharge into the same low-lying catchment in which the Council is investing in measures specifically intended to slow the movement of water and increase natural storage.

2. Conflict with the West Sussex LLFA Culvert Policy

The West Sussex LLFA Culvert Policy states:

“West Sussex Local Authorities are in general opposed to the culverting [piping] of watercourses because of the potential for adverse effect on flood risk and ecology.”

It further requires viable alternatives, including open channels and natural features, to be prioritised.

The Flood Risk and Drainage Strategy (Rev 3) does not demonstrate that a natural or open conveyance arrangement is not reasonably practicable. The use of a pipe therefore requires greater justification, particularly given the sensitivity of the receiving watercourse and surrounding floodplain.

3. The proposal must not increase flood risk elsewhere

The Government’s **Flood Risk and Coastal Change** guidance states that where a proposed development cannot be made safe throughout its lifetime “**without increasing flood risk elsewhere, it should not be permitted.**” The same guidance makes clear that flood-risk measures should not themselves increase flood risk elsewhere.

The **National Standards for Sustainable Drainage Systems (SuDS)** are even more specific. **Standard 1.7** states:

“The runoff from development shall not increase the risk of flooding elsewhere from any source.”

The same standards also state under Standard 1.1 that runoff must be managed in a way that avoids negative impacts on **flood risk, the morphology and water quality of receiving waters and associated ecology**. Standard 1.8 further states that runoff must not cause a risk of pollution of groundwater or surface water bodies.

These requirements are directly relevant to the proposed discharge into the adjoining low-lying watercourse network.

4. Concern over the receiving watercourse and downstream flooding

The site lies above a very low-lying area where the land falls towards a shallow network of drainage channels and watercourses. The proposed outfall would therefore discharge into a receiving system which is itself vulnerable to high water levels and limited conveyance.

The strategy appears to assume that the outfall will discharge freely. However, during periods of heavy winter rainfall, the receiving ditch may already contain substantial quantities of water. If the outlet becomes submerged or the receiving channel is unable to convey the additional flow, the discharge will be subject to backwater conditions rather than the assumed free outfall.

This raises a fundamental question as to whether the proposed system has been demonstrated to operate when the receiving watercourse is already full or partially surcharged.

The applicant has not provided evidence of:

- hydraulic modelling incorporating a surcharged or submerged outfall;
- a physical assessment of the downstream ditch’s actual depth, width, gradient and conveyance capacity; or
- sufficient evidence that discharge from the pipe can be accommodated without increasing flood risk to adjoining land.

The applicant’s own drainage strategy records the swale as “**FLOOD RISK**” in the modelled scenarios and states that, when its remaining capacity is exceeded, water will spill into the open fields to the north.

The entire field is sloping, so such overflow would naturally be expected to move downhill towards the surrounding drainage channels and watercourses.

This is particularly important given the Government's requirement that development and its drainage measures must not increase flood risk elsewhere.

5. Pollution risk from the proposed swale outfall

The proposed arrangement does not demonstrate that pollutants entering the swale will necessarily be removed before water reaches the receiving watercourse.

The National SuDS Standards require runoff to be managed so that it does not adversely affect the water quality of receiving waters and specifically require that runoff does not cause a risk of pollution to surface water bodies.

Potential contaminants include:

- oil and fuel residues;
- tyre and brake particles;
- metals including copper and zinc;
- fine sediment and silt;
- fertilisers and pesticides; and
- microplastics and other debris.

A swale does not instantly or completely remove such pollutants. Its treatment performance depends on the pollutant, flow conditions and the time available for settlement or other treatment processes. Published research has also identified substantially lower pollutant removal in overflow water than in infiltrated water.

During exceedance or overflow conditions, residual suspended and dissolved pollutants could therefore be conveyed through the proposed outfall directly into the adjoining watercourse.

This is particularly concerning because the watercourse is accessible to horses, dogs and other wildlife. The adjoining paddocks are also used as an animal sanctuary for sick and rescued horses [REDACTED]. Introducing potentially contaminated drainage water into a watercourse accessible to these animals therefore presents a significant environmental concern.

6. Flood conditions and ecological sensitivity

The receiving watercourses form part of a low-lying and environmentally sensitive area. The proposed point-source discharge would introduce additional water, together with the potential pollutant load described above, directly into this network.

The drainage strategy must demonstrate not simply that water can leave the development, but that it can be safely conveyed and accommodated downstream without transferring flood or pollution risk elsewhere.

This is consistent with National SuDS Standard 1.1, which requires surface water to be managed so as to avoid negative impacts on flood risk, receiving-water morphology, water quality and associated ecology.

Conclusion

The proposal has not demonstrated that the discharge will comply with the fundamental requirement that runoff from development must not increase flood risk elsewhere. National SuDS

Standard 1.7 states that “the runoff from development shall not increase the risk of flooding elsewhere from any source.”

For these reasons, I strongly object to the proposed drainage arrangements. The unresolved concerns regarding hydraulic capacity, operation under surcharged conditions and pollution control mean that the proposed drainage solution has not been adequately demonstrated as safe, and I respectfully request that it is not accepted in its current form.

Yours faithfully



Oxcroft

Church Farm Walk

Upper Beeding

Attachment

Sent from my iPad

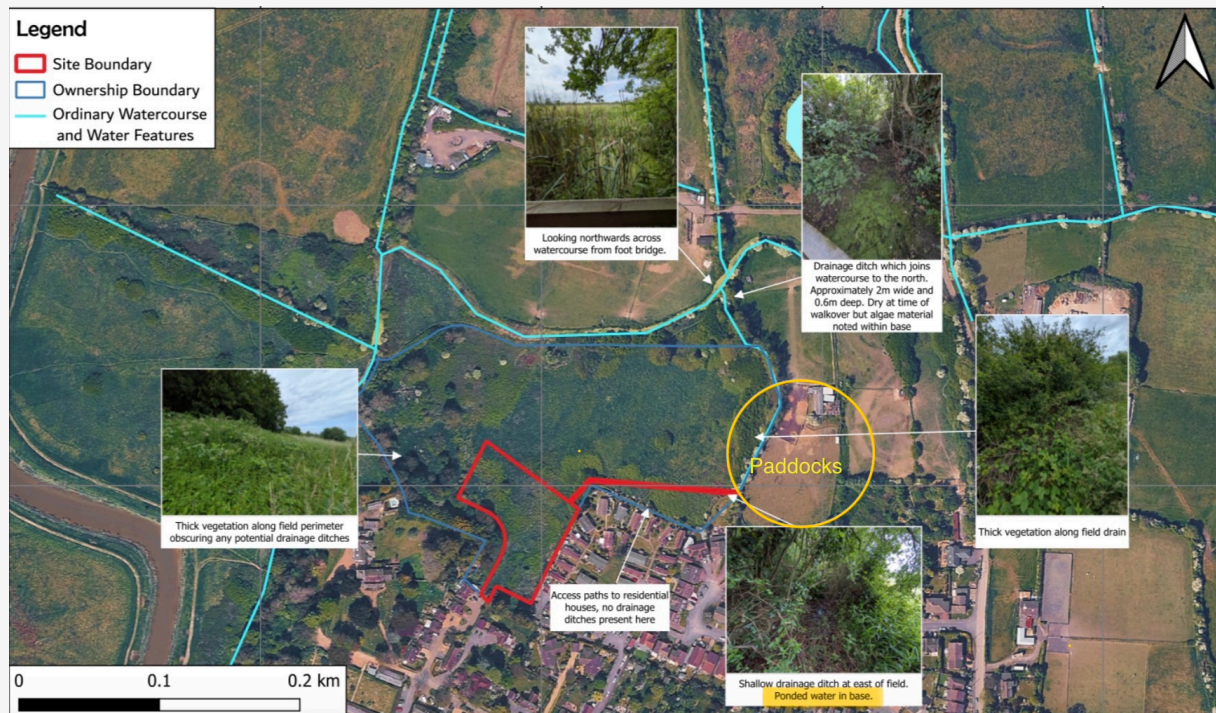
pipe to the nearest ditch.

Figure 2-1

Site location



Persistent Ponding in the Receiving Watercourse Indicates Limited Drainage Capacity





Shallow drainage ditch at east of field.
Ponded water in base.

Figure 2-2

Existing ground elevations from LiDAR data

